

Integrating
The
Monorail

COMMERCIAL CORE &
PIONEER SQUARE

DEIS
Comments

City of Seattle Comments on the
Seattle Monorail Green Line
Draft Environmental Impact
Statement

October 2003



OVERVIEW

The City's DEIS comments for the Commercial Core and Pioneer Square segments emphasize the challenges associated with:

- Utility relocation and associated construction impacts to traffic operations, commercial activity and the quality of life; and
- Ensuring the urban design and landscape choices associated with the alignment, guideway design and streetscape improvements maintain the high-quality built environment and pedestrian environment of the area.

ACCESS & MOBILITY

Intermodal Connections

To support and promote ridership, it is essential to design for seamless connectivity between the monorail and other modes of transit. The FEIS should include more definitive drawings and descriptions of the project facilities that will result in good intermodal connections at major transit hubs such as King Street Station and Westlake Station.

Bicycle Mobility

The FEIS should identify mitigation for removal of the 2nd Avenue bike lane in Alternative 4.3 or identify this as a significant adverse impact (4-66).

NEIGHBORHOODS & BUSINESSES

Removal of the existing monorail station in Westlake Center may reduce the number of people using the space (4-304). What would the impact be on the vitality of Westlake Center, Plaza, and Park, respectively? SMP architecture and urban design studies have proposed an elevated walkway connection to Westlake Center to mitigate this impact; the walkway should be included in the Project Description, or the

land use, neighborhood and economic impacts should be fully disclosed and alternative mitigation proposed.

Views, Aesthetics & Historic/Cultural Resources

The discussion of neighborhood impacts in the Downtown segment notes that "the visual and setting impacts to historic resources would affect the visual context of some historic resources, particularly in Pioneer Square. However, the improved access to the Pioneer Square Historic District and the Pike Place Market Historic District would likely benefit continued economic vitality". It is not clear how enhancing economic vitality will reduce impacts to the visual context of historic resources (4-149).

The "Walrus level" (2nd & 3rd story belt course) on downtown historical resources is comparable in significance with other visual resources. The Walrus level should be included in list of visual resources (4-190).

The Seattle Space Needle is a prominent feature visible from the Downtown area, on-axis, above Second Avenue. The analysis should address this view. (Visual Quality Section)

The document reports that shade impacts on the Garden of Remembrance and the Washington Mutual Tower plaza would be low because of shade created by existing trees. The shade created by trees is not the same quality as that of the guideways. Shade from trees is not uniform and, since they are deciduous, would be very minor in cooler months because leaves are gone. In addition, shade from guideways onto trees could negatively affect their viability. The FEIS should expand the discussion of these issues to reflect these differences (4-212).

The Madison 2 station would create significant negative shade impacts on both the open space and plantings of the Wells Fargo Building; this should be described in the FEIS. (4-212)

The FEIS should be more definitive in statements about visual impacts to architectural features; specific references are provided in the Miscellaneous section of the City's comment letter.

The impacts to Westlake Center and the downtown retail core after the existing monorail is taken down and before the Green Line is operational should be discussed in Construction Impacts (4-150). 4-305 First paragraph. Similar to the aesthetic impacts on Smith Tower because of the contrast in historical period, the Monorail would have an aesthetic impact on Pioneer Square. (Park & Recreation Section)

Areaways within the Pioneer Square National Register Historic District are not accounted for in the description of impacts related to station construction, are not accurately or consistently represented with regard to eligibility for the National Register of Historic Places, and are not accurately or consistently discussed within DEIS discussion of Green Line operation and construction impacts. Detailed references to areaway issues in the DEIS are included in the Miscellaneous section of the City's comment letter.

King Street Station is situated precisely on the dividing line between the Downtown and SODO segments, leading to confusion as to which DEIS section addresses impacts. There is insufficient representation and clarification of impacts to King Street Station resulting from operation and construction of both the Green Line and the Weller/King Street Station. Table 4.11-3 on page 4-333 finds adverse visual effect to King Street Station resulting from the Green Line. Operational effects are addressed on page N-189 and N-190 finding the station listed on the NRHP and that it would be visually adversely affected from the Green Line operation. This does not, however, address specifics of visual obstruction, dividing the tower and altering the visual relationship between the station and the Pioneer Square Preservation District. The station is also

correctly listed in Table 4.17-6 and Table N-3 on pg N-200 as "very sensitive." However, on page 4-213 Alternate 5.1 and 5.2, there is no statement that obstruction of views of the King Street Station will have an adverse visual impact. There is no mention of the Weller/King Street station visual, construction and operation impact on the King Street Station (N-209).

Land Use & Neighborhoods

Regarding the east and center Pike Street station alternatives (4-151/2), if the Pike 2 (East) station alone is a substantially less dense use than what existing zoning could allow, the FEIS should evaluate consistency with the Commercial Core neighborhood plan and articulate why the Pike 3 (Center) station is "less compatible with surrounding existing or planned uses."

The DEIS refers to reviews of the Vancouver Sky Train system and mentions that "office and commercial workers and residents have a lower sensitivity over time to the passage of trains by their windows. As a result, existing adjacent office, commercial, and residential uses should not be adversely affected by the visual presence of the Green Line" (4-150). The fact that the facility desensitizes residents and office workers to impacts over time is not mitigation of the original impact; the FEIS should describe any impact.

The FEIS should discuss the land use impacts of demolition of the Sheridan Apartments associated with Alternative 4.2 (4-151).

UTILITIES & CONSTRUCTION

Traffic Impacts

The routes immediately parallel to the Green Line alignment that could also experience temporary traffic increases due to added traffic from temporary detours should be identified to the extent possible and the anticipated volume increase projected, again to the extent possible. This information could then be used as a basis for mitigation

efforts as described in 4.17.10.1. This will be particularly critical for the Downtown segment when Second Avenue is impacted by construction. The impact will be compounded if the DSTT is closed in 2005 for light rail retrofit due to the added bus volumes and the fact that Third Avenue will be "transit only" during the AM and PM peaks (4-483).

Utility Relocation

Alternative 4.1 on the west side of 2nd Avenue proposes to eliminate the north-south duct run in 2nd Avenue. It is also possible that there will be an impact on the east-west duct banks as well. In this case, then impacts can increase significantly. Temporary and permanent relocation of civil and electrical plant would be required, resulting in two moves of impacted City Light (SCL) facilities (4-470).

Alternative 4.2 on the east side (north of Marion) and west side (south of Marion) of 2nd Ave proposes to eliminate the north-south duct run in 2nd Ave from south of Marion to Yesler. This alternative may produce about 50% of the civil impacts and 2/3 of the electrical impacts of alternative 4.1. Again, if east-west duct banks would be impacted, then the mitigation would be significantly higher. This alternative has a few locations where steam relocations could impact SCL plant (4-470).

Alternative 4.3 in the center of 2nd Avenue features station locations that may impact the 2nd Ave duct run, requiring relocation of the north-south ducts and manholes. There are a large number of east-west duct banks which could be impacted by this alternative, but that risk may be eliminated when column placement is finalized. The cost and time required to mitigate this alternative may be significant, but will likely be relatively small compared to the other two alternatives. A fairly low percentage of relocations would likely require temporary relocation resulting in two moves. A special problem with this alternative is the impact on SSC steam plant. If steam lines are relocated, their new placement must not

impact present or relocated SCL lines. In general, steam lines must be 12 to 13 feet away from SCL duct banks to have minimal impact. If steam lines must be relocated to positions within 13 feet of SCL facilities, cable ratings will be reduced unless mitigated. An engineered solution to restoring cable ampacity will be required at locations within 13 feet of SCL plant (4-470).

Based on available information about proposed structures, construction methods, clearances needed and structural considerations, SCL does not anticipate that it would be possible to locate the Green Line along the west side of Second Avenue without moving existing electrical equipment. Somewhere in the FEIS there needs to be a clear statement about the significance of impacts resulting from selection of the West alignment. The construction period would be longer and the impact on services potentially greater than other alignments. The DEIS only states: "Utility relocations are discussed in the footnotes of Table 4.17-8 and the narrative in Section 4.9.3. Notable relocations are distinguished by their size, quantity, and/or impact on services." What is meant by notable in the context of SEPA and significant impacts? A clear statement indicating there are significant adverse construction impacts associated with relocation of major electrical equipment such as the vaults and ducts along Second Avenue should be made in the FEIS (4-513).

City Light agrees with the conclusion that Alternative 4.1 would be the area with the most electrical facilities affected (4-523). The duration of construction impacts is not stated in the DEIS. SCL estimates relocation of existing electrical facilities along Second will be a multi-year project. This information needs to be contained in the FEIS and cross-referenced into the assessment of construction impacts. Please state Alternative 4.1 along the West Side of Second could require the relocation of a large number of electrical facilities. Relocation of these duct banks would, not could, be costly and time consuming (as

long as ten years), and result in disruptions to service in this high-density retail and business district in order to establish parallel lines. Future detailed engineering analysis may reduce the number of relocations needed.

In discussion of Potential Mitigation for Electrical Service, Water Supply, and Sanitary Sewer/Storm Drains, the DEIS proposes "work with City Light to develop a cost-effective solution and schedule for potential electrical duct bank relocations" (4-531). If the west Second Avenue alignment is selected, it may not be possible to develop "a cost-effective solution and schedule." SCL is not able to comment on the feasibility of this proposal as mitigation, as parameters for cost effectiveness and schedule for completion of relocation are not given. Selection of another alignment would mitigate the construction impacts of duct bank relocations and should at least be considered as possible mitigation.